



HON. SYLVIA O. HINDS-RADIX
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

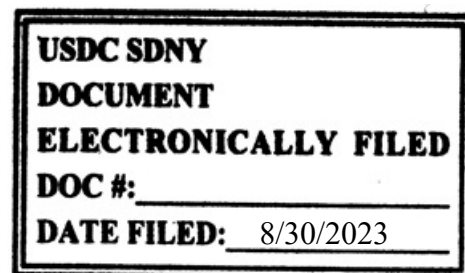
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August 29, 2023

VIA ECF

Hon. Katherine H. Parker
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St. New York, NY 10007-1312

Re: Carmen Quinones v. NYCHHC Jacobi Medical Center, et al.,
1:22 4875 (PGG) (KHP)



Dear Judge Parker :

I am an Assistant Corporation Counsel in the Office of the Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, and attorney for the Defendants (“Defendants”) in the above-captioned matter. I write to respectfully propose a revised briefing schedule that the parties have agreed upon in connection with Defendants’ motion to dismiss, and to seek an adjournment of the October 10, 2023 settlement conference. The Court has not set a date for argument on the motion.

If the Court finds the revised schedule acceptable, Plaintiff pro se’s time to respond to Defendants’ motion would be extended by 30 days, from September 11, 2023, until October 11th, 2023 and Defendants’ time to file their reply 30 days would be concomitantly extended 30 days, from September 25, 2023 until October 25th, 2023. Defendants also request that the settlement conference, currently scheduled for October 10, be adjourned until after the resolution of Defendants’ Motion to Dismiss. Plaintiff pro se consents to this request.¹

Defendants submit this request because I will be on parental leave from August 24th, 2023, until October 10th, 2023, following the birth of my daughter. Defendants’ counsel discussed the matter with the Plaintiff who, for unrelated reasons,² requested that I respectfully ask the Court that she be given additional time to respond to Defendants’ motion to dismiss. This is Defendants’

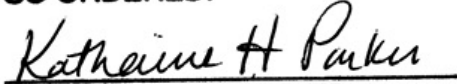
¹ Plaintiff is represented by pro bono counsel for the limited purpose of settlement and will be at this conference. Plaintiff’s pro bono counsel also consents to the proposed schedule.

² Plaintiff provided her reasons to Defendants’ counsel but, given their personal nature, Defendants are reluctant to include them in the public record. We are, of course, prepared to provide them to the Court, if the Court so directs.

second request that the pre-settlement conference be adjourned, and I am hopeful for your understanding and apologize for any inconvenience.

I thank the Court for considering this request.

SO ORDERED:



HON. KATHARINE H. PARKER

UNITED STATES MAGISTRATE JUDGE

8/30/2023

Plaintiff's deadline to respond to the motion to dismiss is extended to **October 11, 2023**. Replies are due **October 25, 2023**.

The settlement conference scheduled on October 10, 2023 at 10:00 a.m. is adjourned.

The Clerk of the Court is respectfully requested to mail a copy of this endorsement to Plaintiff.

Respectfully submitted,

/s/ Eric Arbizo

Eric Arbizo
Assistant Corporation Counsel